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January 26, 2024

Plaintiff has to proceed by motion
to regulate predecessor's
attorney's lien and to transfer the
file.

Sent via ECF

Honorable Alvin K. Hellerstein
500 Pearl Street, Courtroom 14D
New York, NY 10007

SO ORDERED

/s/ Alvin K. Hellerstein U.S.D.J.
February 1, 2024

Re: Bowman v. City of New York et al
Docket No.: 1:23-cv-04269

Dear Judge Hellerstein,

My firm was retained by the Plaintiff herein to take over her representation in this matter on December 22, 2023. We write to the Court to respectfully request assistance obtaining the file for this action from Plaintiff's previous attorneys. On December 26, 2023, we contacted Mr. Kevin Johnson, Plaintiff's outgoing attorney and requested Plaintiff's file. We provided Mr. Johnson with a stop work letter and a consent to change attorney form each of which were signed and notarized. Mr. Johnson did not respond. I again attempted to contact Mr. Johnson on January 3, 2024 and again on January 19, 2024. Today I again attempted to contact Mr. Johnson to obtain the file but was unable to get a hold of him. Discovery demands were scheduled to be served on January 22, 2024. As a result of the delay in obtaining the file in this matter, Plaintiff was unable to comply with that deadline. Defendants graciously consented to an extension until we are able to obtain the file.

Plaintiff seeks court intervention to help obtain the file so we can proceed with this action. As such, we respectfully request an order compelling prior counsel to turn over Plaintiff's file forthwith. We apologize for this request. I have attempted to obtain the file on my own but have been unsuccessful. I thank the Court for its time and consideration related to this matter.

Very truly yours,

John Scola.

John Scola.